UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

Rose, Martha
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6-6-86
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June 6, 1986

MEMORANDUM

SUBJECT: Update - Rose Chemical, Holden, Missouri

FROM: George Hess GKH
Geologist, FIRE/EP&R/ENSV

TO: Charles P. Hensley
Chief, EP&R/ENSV

On June 5, 1986, I accompanied Bob Fine, TAT, to monitor the progress of the Rose Chemical spill cleanup. Dwight Thomas, Carolan Group, requested I visit the site to go over what was expected by EPA concerning the cleanup.

On the way to the site, Mr. Fine and myself delivered the letter dated June 4, 1986, from Charles Hensley to Mr. Carolan, concerning minimum requirements for a 6-foot chain-link fence. At the time of our arrival at the 24th and Charlotte office, Mr. Carolan was working on the fence location for the Holden facility. He asked if it was okay to leave a portion of the site by the east gate open and gave several reasons. I indicated he could propose the idea and the justifications to Morby's group since it was their decision. While at Mr. Carolán's office, I requested and received a copy of the map he was using for the fence diagram (Plot Plan W.C. Carolan Co., Inc., Revision 7).

Upon arrival on site at 1300 hours, we were met by Dwight Thomas and Pat Perrin, WCCI. We proceeded to the spill site. Two American Steel employees were working in the creek area. No water was flowing in the creek and water was only ponded in a few locations along the first 300 feet below the sewer outfall. Some excavation has been accomplished in the area of the outfall pipe. I showed Mr. Thomas and Mr. Perrin areas in the creek channel with oil residue and indicated with minimal effort it could be removed since the residue was caused by the water receding after the high water period immediately after the spill. We proceeded to the collection ponds at the southwest corner of the facility. The ponds were within two to three feet of overtopping. I indicated the observation and that water should be removed from the ponds. This action would have to be approved by the MDNR through their NPDES permit or by trucking the tested water to the Holden wastewater treatment plant (approximately 200 yards west of ponds). However, prior to discharging the water the oil on the pond surface and banks should be cleaned up or the water removed from the pond so as not to pick up the floating oil.

We proceeded up the ditch line to the point where the storm sewer was intercepted. Oil was still visible floating at the pipe discharge point to the ditch. Several oil-saturated decomposing absorbant pads were visible. I reiterated by pointing out that it did not require much effort to place and remove the necessary abosrbant pads in this area, and that absorbant pads were not overly expensive. We then proceeded to the office area. The findings were relayed to James Carolan and he committed to expedite the clean-up progress. Both Mr. Thomas and Mr. Carolan reiterated the fact that the Carolan Group was doing the best they could do, but did not have much money to work with. Both Thomas and Carolan were presenting hypothetical questions concerning what would happen if the site became a superfund site and/or it could be shown that the Carolan Group could not fund a total cleanup. I indicated that the EPA considers the uniqueness of each site when it comes to a "government-financed cleanup."

The sampling plan was discussed and Dwight Thomas indicated it would be complete by 1500 hours on June 5, 1986. I indicated Bob Fine would pick it up when completed.

During our time on site, a former American Steel Works employee was assigned at the east gate to the facility as the "security person on site." Several ETI personnel were on site, but were not engaging in the cleanup. It appeared they were assessing the situation to determine if ETI was going to pull off site.

We left the site at approximately 1430 hours.

cc: Scott Pemberton, CNSL

June 6, 1986

MEMORANDUM

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Chemist, SINV/EP&R/ENSV

TO: Charles P. Hensley
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cc: Scott Pemberton, CWSL